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UNITED STA	IES BA	NKKUPICI COUKI
DISTRICT	OF SO	UTH CAROLINA
)	
)	CASE NO: 15-04033-jw
Hampton Hill Athletic Club, Inc.)	CHAPTER: 11
)	
)	NOTICE OF MOTION AND
)	OPPORTUNITY FOR HEARING
Debtor in Possession)	
)	

TAKE NOTICE that the Debtor has filed a motion to dismiss Chapter 11 case. A copy of the motion and proposed order accompanies this notice.

TAKE FURTHER NOTICE that any response, return and/or objection to the motion, should be filed with the Clerk of the Bankruptcy Court no later than twenty-one (21) days from service of the motion.

TAKE FURTHER NOTICE that no hearing will be held on this motion or application unless a response, return and/or objection is timely filed and served, in which case, the court will conduct a hearing on November 17, 2015 at 9:30 am, at J. Bratton Davis United States Bankruptcy Courthouse, 1100 Laurel Street, Columbia, SC 29201. No further notice of this hearing will be given.

Service date: October 7, 2015

MOORE TAYLOR LAW FIRM, PA

By: /s/ Jane H. Downey
Jane H. Downey, ID 5242
PO Box 5709
West Columbia, SC 29171
(803) 929-0030
jane@mttlaw.com

Attorney for Debtor in Possession

Address of Court: J. Bratton Davis United States Bankruptcy Courthouse 1100 Laurel Street Columbia, SC 29201 Case 15-04033-jw Doc 90 Filed 10/07/15 Entered 10/07/15 11:09:42 Desc Main Document Page 2 of 7

UNITED STATES BANKRUPTCY COURT DISTRICT OF SOUTH CAROLINA

IN RE:)	
)	CASE NO: 15-04033-jw
Hampton Hill Athletic Club, Inc.)	CHAPTER: 11
-)	
)	MOTION TO DISMISS CHAPTER 11
Debtor in Possession)	CASE AND MEMORANDUM IN SUPPORT

Pursuant to 11 U.S.C. §1112(b)(1), Debtor in Possession ("Debtor") moves for dismissal of the Chapter 11 case. Debtor does not believe it has the resources necessary to reorganize. Debtor believes there would be no distribution for unsecured creditors upon conversion, such that dismissal over conversion is in the better interest of creditors and the estate.

/s/ Anne W. Wright
Ann W. Wright, Owner and President
Hampton Hill Athletic Club, Inc.

MOORE TAYLOR LAW FIRM, PA

By: /s/ Jane H. Downey
Jane H. Downey, ID 5242
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(803) 929-0030
jane@mttlaw.com

Attorney for Debtor in Possession

October 6, 2015

UNITED STATES BANKRUPTCY COURT DISTRICT OF SOUTH CAROLINA

)	CERTIFICATE OF SERVICE
Debtor in Possession.)	
)	
•)	
Hampton Hill Athletic Club, Inc.)	CHAPTER: 11
)	CASE NO: 15-04033-jw
IN RE:)	

I, the undersigned attorney for the Debtor in Possession, do hereby certify that I have served a copy of the pleading(s) hereinbelow specified by mailing a copy of the same by United States Mail, postage prepaid, to the following address(es):

Pleadings: Notice of Motion/Application and Opportunity for Hearing

Motion to Dismiss Chapter 11 Case

Proposed Order Certificate of Service

Parties Served: Creditors on attached matrix

MOORE TAYLOR LAW FIRM, PA

By: /s/ Jane H. Downey
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PO Box 5709
West Columbia, SC 29171
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jane@mttlaw.com

Attorney for Debtor in Possession

October 7, 2015

Label Matrix for local noticing 0420-3

Case 15-04033-jw District of South Carolina Columbia

Wed Oct 7 11:02:07 EDT 2015

ACE Glass Company, Inc. PO Box 4432

Columbia SC 29240-4432

American Express Bank FSB c/o Becket and Lee LLP

POB 3001

Malvern, PA 19355-0701

RR&T PO Box 580340

Charlotte NC 28258-0349

Beverly Watkins 45 Woodwind Court Columbia SC 29209-4235

Business Development Corporation BDC Enoree Bldg, Ste 225 111 Executive Center Drive Columbia SC 29210-8436

Business Telephone of SC, Inc. PO Box 2807

West Columbia SC 29171-2807

Celtic Bank Corporation 268 South State Street, Ste 300 Salt Lake City UT 84111-5314

Complete Copier Center, Inc. 3200 Two Notch Road Columbia SC 29204-2874

Design Air Systems, Inc. 6 Sandy Knoll Court Columbia SC 29209-5424

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Document Page 4 of 7

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Columbia, SC 29202-1390 Celtic Bank Corporation c/o Barton Law Firm PO Box 12046 Columbia, SC 29211-2046

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PO box 147 Columbia SC 29202-0147

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Eric Steven Bland Case 15-04033-jw Doc 90 Filed 10/07/15 Entered 10/07/15 11:09:42 Desc Main 3455 Document Way, Tsuite Page 5 of 7 FEDERAL WAY WA 98001-9546

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Hampton Hill Ladies, Inc. c/o Anne Wright, Registered Agent 5910 Garners Ferry Road Columbia, SC 29209-1301

Internal Revenue Service PO Box 7346 Philadelphia PA 19101-7346 J. Douglas Barnett Assistant US Attorney 1441 Main Street, Ste 500 Columbia SC 29201-2862

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NBSC Card Services PO Box 2181 Columbus GA 31902-2181

Neill Technologies PO Box 752 Hammond, LA 70404-0752

Reta M. Whitten 716 Kawana Road Columbia, SC 29205-2031 Reta M. Whitten c/o Gary W. Popwell, Jr. PO Box 1505 Columbia SC 29202-1505

4120 Devereaux Road Columbia SC 29205-2029

Richard G. Wright Case 15-04033-jw Doc 90 Filed 10/07/15 Entered 10/07/15 11:09:42 Desc Main Richard County Treasure Page 6 of 7 PO BOX 11947 Ment Columbia SC 29211-1947

3302 Mullwood Ave Columbia SC 29205

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South Carolina Department of Revenue PO Box 12265 Columbia SC 29211-2265

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John Timothy Stack Office of the United States Trustee 1835 Assembly Street Suite 953 Columbia, SC 29201-2448

TNG Worldwide/The Industry Source 29683 W. K. Smith Drive New Hudson MI 48165-8551

Time Warner Business Cable PO Box 77169 Charlotte NC 28271-7004

Tribe Team Training, North America 1 Place Ville Marie, Ste 2001 Montreal, Quebec H3B 2C4

US Trustee's Office Strom Thurmond Federal Building 1835 Assembly St. Suite 953 Columbia, SC 29201-2448

Wells Fargo Bank, N.A. 1 Home Campus MAC X2303-01A Des Moines, IA 50328-0001 Wisehart Holdings c/o Robin Dial 2712 Middleburg Drive, Ste 208 Columbia SC 29204-2415

Wiseheart Holdings LLC c/o Stanley H. McGuffin, Esq. Haynsworth Sinkler Boyd, PA PO Box 11889 Columbia, SC 29211-1889

> The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

BB&T Bankruptcy M/C 100-50-01-51 P.O. Box 1847 Wilson, NC 27894-1847

SCE&G PO Box 100255 Columbia SC 29202

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)American Express Bank FSB c/o Becket and Lee LLP POB 3001 Malvern PA 19355-0701

(d)CosmoProf attn: Tanis Wilson 3900 Morse Street Denton, TX 76208-6333 (u) Hampton Hill Ladies, Inc.

Case 15-04033-jw Doc 90 Filed 10/07/15 Entered 10/07/15 Intered 10/07/15 Entered 10/07/15 E